

SHER TREMONTE LLP

November 25, 2019

**VIA ECF**

Honorable Nicholas G. Garaufis  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: *United States v. Raniere, et al.*, 18 Crim. 204 (NGG)**

Dear Judge Garaufis:

I write to respectfully request a temporary modification of Kathy Russell's bail conditions to allow her to travel to St. Augustine, Florida for Thanksgiving. Ms. Russell would leave and return from Georgia on Thursday, November 28. Earlier this year, Ms. Russell's sister, Kelly, lost her husband. Kelly is spending Thanksgiving with her late husband's family in Florida and Ms. Russell would appreciate the opportunity to support her sister during this difficult time.

The government, by AUSA Tanya Hajjar, and Pretrial Services do not object to Ms. Russell's request.

I appreciate the Court's consideration.

Respectfully submitted,

/s/ Justine A. Harris

Justine A. Harris

cc: All Counsel (via ECF)